

**ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE  
ARBITRATION BETWEEN

**THE NATIONAL FOOTBALL LEAGUE** :  
**PLAYERS ASSOCIATION On Behalf of** :  
**Steve Harvey, David Alexander and Marlon** :  
**Kerner** :

and

**THE NATIONAL FOOTBALL LEAGUE** :  
**MANAGEMENT COUNCIL On Behalf of** :  
**THE BUFFALO BILLS and THE NEW** :  
**YORK JETS** :

Civil Action No. 08-cv-3658 (PAC)

**NOTICE OF MOTION AND**  
**MOTION TO ADMIT DANIEL L.**  
**NASH *PRO HAC VICE***

**THE NATIONAL FOOTBALL LEAGUE** :  
**PLAYERS ASSOCIATION On Behalf of** :  
**Charles Smith, Dusty Renfro, Michael Swift** :  
**and Jason Peter** :

and

**THE NATIONAL FOOTBALL LEAGUE** :  
**MANAGEMENT COUNCIL On Behalf of** :  
**THE CAROLINA PANTHERS** :

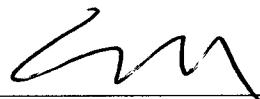
PLEASE TAKE NOTICE that upon the accompanying declaration of Sean E. O'Donnell in support of this motion and the Certificate of Good Standing attached thereto, Sean E. O'Donnell will move this Court before the Honorable Paul A. Crotty at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York as soon as the Court may direct, pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York, for an order allowing the admission of Daniel L. Nash, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel.

Daniel L. Nash is a partner at Akin Gump Strauss Hauer & Feld LLP, and is a member in good standing of the bar of the District of Columbia. There are no pending disciplinary proceedings against Daniel L. Nash in any state or federal court.

WHEREFORE the movant respectfully requests that the Court enter an order in the accompanying form granting Daniel L. Nash admission *pro hac vice* in this case.

Dated: May 8, 2008  
New York, New York

Respectfully submitted,



Sean E. O'Donnell (SO-5005)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
590 Madison Avenue  
New York, New York 10022  
Telephone: (212) 872-1093  
Facsimile: (212) 872-1002  
sodonnell@akingump.com

*Counsel for Respondent The National Football  
League Management Council*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE  
ARBITRATION BETWEEN

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<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>PLAYERS ASSOCIATION On Behalf of</b>	:	
<b>Steve Harvey, David Alexander and Marlon</b>	:	Civil Action No. 08-cv-3658 (PAC)
<b>Kerner</b>	:	
<b>and</b>	:	
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>MANAGEMENT COUNCIL On Behalf of</b>	:	
<b>THE BUFFALO BILLS and THE NEW</b>	:	
<b>YORK JETS</b>	:	
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>PLAYERS ASSOCIATION On Behalf of</b>	:	
<b>Charles Smith, Dusty Renfro, Michael Swift</b>	:	
<b>and Jason Peter</b>	:	
<b>and</b>	:	
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>MANAGEMENT COUNCIL On Behalf of</b>	:	
<b>THE CAROLINA PANTHERS</b>	:	

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Sean E. O'Donnell, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Akin Gump Strauss Hauer & Feld LLP, counsel for Respondent The National Football League Management Council in the above-captioned action. I submit this declaration based on my personal knowledge of the facts set forth herein and in support of this motion to admit Daniel L. Nash as counsel *pro hac vice* in this matter.

2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Daniel L. Nash is also a partner at Akin Gump Strauss Hauer & Feld LLP. His business address is 1333 New Hampshire Avenue NW, Washington, DC 20036. His telephone and facsimile numbers are (202) 887-4067 and (202) 887-4288, respectively, and his email address is dnash@akingump.com.

4. I have found Daniel L. Nash to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. As shown in the Certificate of Good Standing, attached hereto as Exhibit A, Daniel L. Nash is a member in good standing of the bar of the District of Columbia.

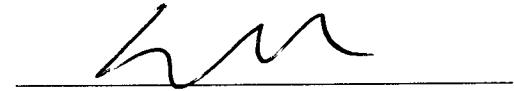
6. There are no pending disciplinary proceedings against Daniel L. Nash in federal or state court.

7. Accordingly, I am pleased to move the admission of Daniel L. Nash *pro hac vice*.

8. I respectfully submit a proposed order, attached hereto as Exhibit B, granting the admission of Daniel L. Nash *pro hac vice*.

WHEREFORE it is respectfully requested that the motion to admit Daniel L. Nash *pro hac vice* to represent Respondent The National Football League Management Council in the above-captioned matter be granted.

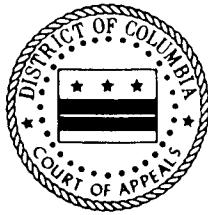
Respectfully submitted,



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Sean E. O'Donnell (SO-5005)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
590 Madison Avenue  
New York, New York 10022  
Telephone: (212) 872-1093  
Facsimile: (212) 872-1002  
sodonnell@akingump.com

*Counsel for Respondent The National Football League Management Council*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

DANIEL L. NASH

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was on the 19<sup>th</sup> day of DECEMBER, 1983

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duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 6,  
2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE  
ARBITRATION BETWEEN

THE NATIONAL FOOTBALL LEAGUE :  
PLAYERS ASSOCIATION On Behalf of :  
Steve Harvey, David Alexander and Marlon :  
Kerner : Civil Action No. 08-cv-3658 (PAC)  
and :  
THE NATIONAL FOOTBALL LEAGUE :  
MANAGEMENT COUNCIL On Behalf of :  
THE BUFFALO BILLS and THE NEW :  
YORK JETS :  
THE NATIONAL FOOTBALL LEAGUE :  
PLAYERS ASSOCIATION On Behalf of :  
Charles Smith, Dusty Renfro, Michael Swift :  
and Jason Peter :  
and :  
THE NATIONAL FOOTBALL LEAGUE :  
MANAGEMENT COUNCIL On Behalf of :  
THE CAROLINA PANTHERS :  
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**ORDER FOR ADMISSION  
*PRO HAC VICE* ON  
WRITTEN MOTION**

Upon the motion of Sean E. O'Donnell, counsel for Respondent The National Football League Management Council in the above-captioned action, and the Court having considered the facts as set forth in the supporting Declaration of Sean E. O'Donnell, and good cause having been shown for the relief specified herein,

IT IS HEREBY ORDERED that Daniel L. Nash of Akin Gump Strauss Hauer & Feld LLP is admitted *pro hac vice* to appear or try this particular case in whole or in part as counsel or advocate for Respondent The National Football League Management Council in accordance with Local Rule 1.3(c).

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

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United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 8, 2008, I caused to be served via overnight mail true and correct copies of the Notice of Motion and Motion to Admit Daniel L. Nash *Pro Hac Vice*, Declaration of Sean E. O'Donnell in Support of Motion to Admit Counsel *Pro Hac Vice*, and [Proposed] Order on Petitioner's counsel:

Jeffrey L. Kessler  
Adam J. Kaiser  
Michelle Lo  
DEWEY & LEBOEUF LLP  
1301 Avenue of the Americas  
New York, New York 10019-6092  
*Attorneys for petitioner*  
*National Football League Players Association*

Dated: May 8, 2008  
New York, New York



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Sean E. O'Donnell

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

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ROBERTA E. ASHKIN (#115461515)  
Local Counsel  
580 Broadway, Ste. 1101  
New York, NY 10012  
212-965-0010  
212-965-1301 - fax  
[robertaashkin@aol.com](mailto:robertaashkin@aol.com)

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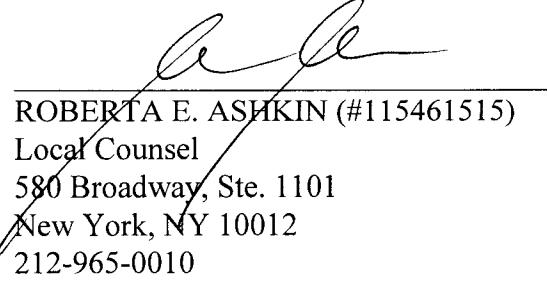
**MOTION TO ADMIT COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Roberta E. Ashkin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Christopher D. Kuebler  
O'Bryan Baun Cohen Kuebler  
401 S. Old Woodward, Ste. 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6047 - fax

Christopher D. Kuebler is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against Christopher D. Kuebler.

  
ROBERTA E. ASHKIN (#115461515)  
Local Counsel  
580 Broadway, Ste. 1101  
New York, NY 10012  
212-965-0010  
212-965-1301 - fax  
[robertaashkin@aol.com](mailto:robertaashkin@aol.com)

Dated:

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 5<sup>th</sup> day of May, 2008 a copy of the foregoing was forwarded via first class mail with postage fully prepaid thereon to:

Sealift, Inc.  
68 W. Main St.  
Oyster Bay, NY 11771



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

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STATE OF NEW YORK      )  
                                  )SS  
COUNTY OF                    )

**AFFIDAVIT OF ROBERTA E. ASHKIN**  
**IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Christopher D. Kuebler as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Christopher D. Kuebler since 2007.

4. Christopher D. Kuebler is associated with the firm of O'Bryan Baun Cohen

Kuebler Karamanian in Birmingham, Michigan.

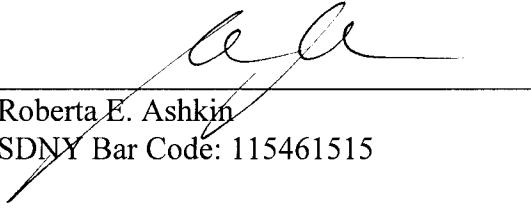
5. I have found Christopher D. Kuebler to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Christopher D. Kuebler, pro hac vice.

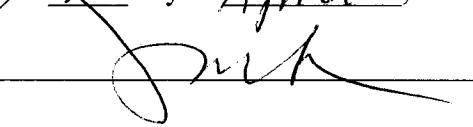
7. I respectfully submit a proposed order granting the admission of Christopher D. Kuebler, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Christopher D. Kuebler, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

  
Roberta E. Ashkin  
SDNY Bar Code: 115461515

Subscribed and sworn to before me  
this 21<sup>st</sup> day of April, 2008.

  
SCOTT A. RUBMAN  
Notary Public, State of New York  
No. 4818174  
Qualified in New York County  
Commission Expires May 31, 2010

**THE SUPREME COURT of the STATE OF MICHIGAN**

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

*Christopher D. Kuebler*

was admitted to the practice of law in the courts of the State of Michigan on

*January 26, 1990*

and has remained in good standing since then.

In Testimony Whereof, I set my hand and  
affix the seal of the Michigan Supreme  
Court on this date: April 30, 2008

*Angela J. Mays*  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES MELENDREZ,

Plaintiff,

-vs-

Case No: 08-CV-3820

SEALIFT, INC.,

Defendant.

/

**ORDER FOR ADMISSION PRO HAC VICE**  
**ON WRITTEN MOTION**

Upon the motion of Robert E. Ashkin, attorney for Plaintiff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Christopher D. Kuebler  
O'Bryan Baun Cohen Kuebler Karamanian  
401 S. Old Woodward, Ste. 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6057 fax  
[ckuebler@obryanlaw.net](mailto:ckuebler@obryanlaw.net)

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall

forward the pro hac vice fee to the Clerk of the Court.

Dated:

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United States District Judge